## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : BANKRUPTCY CASE NO. 18-11178-TPA

:

Gloria Jean Knapp, : CHAPTER 13

Debtor, :

\_\_\_\_\_ : DOCKET NO.: 30

Freedom Mortgage Corporation,

Movant,

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vs

:

Gloria Jean Knapp,

:

And

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Ronda J. Winnecour, Esquire,

Chapter 13 Trustee : Respondents. :

## **DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE**

The Chapter 13 Plan payment amount dated June 5, 2019, is sufficient to fund the Chapter 13 Plan moving forward. Debtor's attorney has reviewed the existing Plan and finds that the existing payment is adequate. The current payment amount is \$1,032.91. The new post-petition monthly payment payable to Freedom Mortgage Corporation is \$1,041.80, effective December 1, 2020 per the escrow notice filed November 7, 2019.

Respectfully submitted,

Date: November 26, 2019 /s/ Daniel P. Foster, Esquire

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